IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

ALEXANDRIA DIVISION

ROSY GIRON DE REYES, et al.,

Plaintiffs,

v.

WAPLES MOBILE HOME PARK LIMITED PARTNERSHIP, et al.,

Defendants.

Civil No.: 1:16-cv-563 (TSE) (TCB)

<u>DEFENDANTS' MOTION IN LIMINE TO EXCLUDE EVIDENCE OF LEASE</u> <u>MATERIALS AND PURPORTED "EVICTION" CORRESPONDENCE</u>

Defendants Waples Mobile Home Park Limited Partnership, Waples Project Limited Partnership, and A. J. Dwoskin & Associates, Inc. (collectively "Defendants"), by counsel, respectfully submit their Motion *In Limine* to Exclude Evidence of Lease Materials and Purported "Eviction" Correspondence. The grounds for this requested relief are set forth in a contemporaneously filed Memorandum in Support. A proposed Order is attached.

Respectfully submitted,

WAPLES MOBILE HOME PARK LIMITED PARTNERSHIP, WAPLES PROJECT LIMITED PARTNERSHIP AND A. J. DWOSKIN & ASSOCIATES, INC.

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of January, 2021, I caused the foregoing to be filed electronically with the Clerk of the Court using CM/ECF, which will then send a notification of such filing to all counsel of record.

/s/ Grayson P. Hanes (VSB No. 06614) Michael S. Dingman (VSB No. 30031) Justin deBettencourt (VSB No. 83806) REED SMITH LLP 7900 Tysons One Place Suite 500 McLean, Virginia 22102 (703) 641-4200 (Telephone) (703) 641-4340 (Facsimile) ghanes@reedsmith.com mdingman@reedsmith.com jdebettencourt@reedsmith.com Counsel for Defendants